

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION
CASE NUMBER:**

Jennifer Walker, individually, and as Parent
Natural Guardian, Next Friend of K.W. a
minor and Roslyn Venetia Walker,

Plaintiffs,

v.

Gurvir Singh Benipal and Stanford
Transportation, Inc.,

Defendants.

NOTICE OF REMOVAL

**TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, FLORENCE DIVISION:**

The Defendants, Gurvir Singh Benipal and Stanford Transportation, Inc. (hereinafter “Defendants”), would respectfully show in support of their Notice of Removal that:

1. This action was commenced on or about October 21, 2021 in the Court of Common Pleas for Williamsburg County, South Carolina. A copy of the Plaintiff’s Summons and Complaint are attached, along with Plaintiffs’ Response to Defendants’ Request for Admission, which is the basis of this Notice of Removal.

2. This action is one of a civil nature over which the District Courts of the United States have original jurisdiction, said action having been brought by the Plaintiffs against the Defendants for injuries sustained in an accident.

3. The amount in controversy exceeds Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs, all of which will more fully appear from the attached Plaintiffs’ Response to Defendants’ Request for Admission; there is complete diversity of citizenship and, therefore, this Court has jurisdiction in accordance with Title 28 U.S.C. §1332(a)(1). Defendants believe the proper division of this court would be the Florence Division.

4. Upon information and belief, at the time of the commencement of this action, the Plaintiffs were citizens and residents of the State of South Carolina; the Defendant, Stanford Transportation, Inc., was a corporation organized and existing under the laws of the State of California with its principal place of business in Bakersfield, California. The Defendant, Gurvir Singh Benipal, was a citizen and resident of the State of California. Therefore, there is diversity of citizenship between the Plaintiffs and Defendants.

5. These Defendants filed an Answer in this action with the Court of Common Pleas for the State of South Carolina on November 5, 2021, and it is attached hereto for reference.

6. These Defendants have furnished to the Clerk of Court for Williamsburg County a copy of this Notice of Removal.

MURPHY & GRANTLAND, P.A.

s/ Ronald B. Diegel

Ronald B. Diegel, Esquire (Federal I.D. No. 05827)

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(803) 782-4100

Attorneys for the Defendants, Gurvir Singh Benipal
and Stanford Transportation, Inc.

Columbia, South Carolina
December 20, 2021

Certificate of Service

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., Attorneys for Defendants, do hereby certify that on December 20, 2021, I have served a copy of the foregoing Notice of Removal, Civil Cover Sheet, and Local Rule 26.01 Interrogatories in connection with the above-referenced case placing same in the U.S. mail, postage paid to:

M. Amanda Shuler, Esquire
Whetstone, Perkins & Fulda, LLC
P.O. BOX 980
Kingstree, SC 29556

s/ Ronald B. Diegel
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